

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

UNITED STATES OF AMERICA

v.

JACQUES ROY, ET AL.

CRIMINAL NO. 3:12-CR-54-L

GOVERNMENT'S EXHIBIT LIST

The United States Attorney for the Northern District of Texas, by and through the undersigned Assistant United States Attorney, files this, the Government's Exhibit List, in the above-captioned case.

EXHIBIT	DESCRIPTION	OFFERED	ADMITTED
MEDISTAT GROUP ASSOCIATES, P.A. ("MEDISTAT") OFFICE SEARCH			
1	Medistat office – Search photos		
2	Medistat office – Search photo log		
3	Medistat office – Search sketch		
4	Medistat office – Search inventory		
5	Program Announcement from Teri Shipman folder dated April 1, 2004		
6	Medistat interoffice memo regarding fraud letter to all home health agencies		
7	Blank forms – Medistat (Referral, Physician's Order, Face to Face Encounter)		
8	Dallas Cowboys cover notebook with handwritten notes		
9	Augie Galindo – Schedule Info		
10	Billed Pulmonary folder (2011)		
11	Orange cover notebook with handwritten notes (2010-2011)		
12	Denied CPO folders		

EXHIBIT	DESCRIPTION	OFFERED	ADMITTED
13	Handwritten notebooks with notes on CPOs		
14	Examples of spirometry and 6 minute walk test forms		
15	Pulmonary function testing info for Doris Williams, Myrtle Mallory, and Emma Hicks		
16	Schedule book for Sarah Slatter		
17	Notes for New Patient Referrals and new patient referral forms (2011)		
18	Texas Medical Board disciplinary documents for Dr. Roy found at Medistat		
19	Medistat Compliance Meeting Report memo from January 7, 2011		
20	Email correspondence between Scooter Beasley and Heather Bowles dated July 3-7, 2008		
21	Email from Heather Bowles to Porsche Bennett and Teri Shipman dated July 13, 2010		
22	Medistat memo to all home health agencies regarding buying patients and homebound status (2010)		
23	Email from Teri Shipman to Nick Lamarre with attachments on November 3, 2010		
24	Email from Augie Galindo to Jessica Hernandez on December 6, 2010		
25	Email from Shena Mote to np@healthcaremedical.net dated December 22, 2010		
26	Email from Kitara Reeves to Augie Galindo on February 3, 2011		
27	Jessica Hernandez – computer screenshots (May-June 2011)		
28	Rachel Casillas – computer screenshots (May-June 2011)		
29	Tashawna Sorrells – computer screenshots (May-June 2011)		
30	Email from msteedy26w@yahoo.com to Dr. Roy with attachment of Texas Driver's License for Tiara A. Lemelle on September 9, 2011		
31	Notes from Heather Bowles regarding calls placed to Medicare about pulmonary billing		

EXHIBIT	DESCRIPTION	OFFERED	ADMITTED
32	Medistat Billing Department Manual excerpt on 485 Biller Job Duties		
33	Medistat Billing Department Incentive Program spreadsheet		
34	Teri Shipman resume		
35	Medistat memo regarding compliance with federal regulations		
36	Blank forms - HomeCare Physician (Authorization and Consent for Medical Treatment, Physician Orders, Referral for Home Health, Recheck/Reassessment – last page labeled “Cynthia Intake”)		
37	Blank forms – Medistat (Authorization and Consent for Medical Treatment, Physician Orders, Referral for Home Health, Recheck/Reassessment)		
38	Notes about James Veasey and Cynthia Stiger		
39	Notes entitled “How to Bill 485s”		
40	HomeCare Charges list		
41	Medicare Reimbursement Analysis		
MEDISTAT STORAGE UNIT SEARCH			
42	Medistat storage unit – Search photos		
43	Medistat storage unit – Search photo log		
44	Medistat storage unit – Search inventory		
45	485s signed by Kendy Munoz under Dr. Roy’s signature		
DR. ROY RESIDENCE SEARCH			
46	Dr. Roy residence – Search photos		
47	Dr. Roy residence – Search photo log		
48	Dr. Roy residence – Search sketch		
49	Dr. Roy residence – Search inventory		
50	“Dr. Roy Signature Samples” packet		
51	Folder entitled “Apple Reimbursement” and handwritten letters		

EXHIBIT	DESCRIPTION	OFFERED	ADMITTED
52	Folder entitled “Dr. Roy Apple Contracts-New Patients”		
53	Certificate of Limited Partnership documents for RoyLam, Ltd.		
54	“Hide Your A\$\$ETS and Disappear: A Step-by-Step Guide to Vanishing Without a Trace” By One of the Government’s Premier Experts on Finding Them by Edmund J. Pankau		
55	“Jerome Schneider’s Complete Guide to Offshore Money Havens: How to Make Millions, Protect Your Privacy and Legally Avoid Taxes” by Jerome Schneider		
56	“The Offshore Money Manual: How to Send Your Money Overseas Swiftly, Privately, and Profitably” Updated and Edited by Adam Starchild		
57	Folder regarding Michel Poulin identity		
PHONE DOWNLOADS FROM DR. ROY RESIDENCE			
58	Dr. Roy text messages with Nick Lamarre		
59	Dr. Roy text messages with Shalitris Medlock		
60	Dr. Roy text messages with Suzana Tran		
61	Dr. Roy text messages with Tashawna Sorrells		
62	Dr. Roy text messages with Tiara Lemelle		
CHARRY HOME CARE SERVICES, INC. (“CHARRY”) OFFICE SEARCH			
63	Charry office – Search photos		
64	Charry office – Search photo log		
65	Charry office – Search sketch		
66	Charry office – Search inventory		
67	Charry Medicare Enrollment Application and EFT Agreement found at office		
68	Charry Health Care Services, Inc. General Orientation Manual and blank forms		
69	Excerpts from Charry Licensed & Certified Forms Manual		

EXHIBIT	DESCRIPTION	OFFERED	ADMITTED
70	DePromise Home Health Patient Roster dated April 20, 2010		
71	DePromise Home Health Patients List		
72	Charry Patient Roster dated March 7-8, 2011		
73	Charry Medicare Episode Ending Report dated March 7, 2011		
74	Charry Patient List for Donatus Benson		
75	\$500.00 Western Union Money Transfer from Charity Eleda to Kenneth Farr		
76	Charity Eleda resume		
77	Charity Eleda passports (Nigeria and United States)		
CHARITY ELEDA RESIDENCE SEARCH			
78	Charity Eleda residence – Search photos		
79	Charity Eleda residence – Search photo log		
80	Charity Eleda residence – Search sketch		
81	Charity Eleda residence – Search inventory		
82	Blank forms – Charry (OASIS Patient Assessment, OASIS Tracking Sheet, Recertification, Nursing Clinical Progress Note, SN Clinical Progress Note, Physician’s Telephone/Verbal Order, Referral/Intake Form)		
ADDITIONAL CHARRY DOCUMENTS			
83	Lufthansa German Airlines flight records for Charity Eleda on February 7-17, 2011		
84	U.S. Customs and Border Protection records for Charity Eleda on February 7 and 17, 2011		
APPLE OF YOUR EYE HEALTH CARE SERVICES, INC. (“APPLE”) OFFICE SEARCH			
85	Apple office – Search photos		
86	Apple office – Search photo log		
87	Apple office – Search sketch		
88	Apple office – Search inventory		

EXHIBIT	DESCRIPTION	OFFERED	ADMITTED
89	Blank forms – Apple (Referral/Intake Screening Form, Physician Orders, Referral for Home Health Evaluation,)		
90	Cynthia Stiger resumes (2005 and 2006 update)		
91	Cynthia Stiger letter to James Veasey dated October 25, 2011		
92	Apple Employee Contact Lists		
93	Apple patient referrals for 2008 and 2011		
94	Wilbert Veasey Employment Application dated September 19, 2011		
95	Wesley Stiger Employee Data File		
96	Homebound, or Not? Quiz and Apple Homebound Status Checklist		
97	Open leads/referrals folder		
98	New employee handout on agency compliance with HIPAA		
99	Medicare Benefit Policy Manual / Chapter 7 – Home Health Services		
100	Apple faxes to Dr. Roy		
101	Apple Board of Directors Meeting Minutes for August-September 2011		
CYNTHIA STIGER PHONE DOWNLOAD			
102	Text message from James Veasey to Cynthia Stiger on August 12, 2011		
103	Text messages between Jacques Roy, James Veasey, and Cynthia Stiger on September 5, 2011		
ADDITIONAL APPLE DOCUMENTS			
104	Apple Medicare Referral Log dated April-June 2010		
105	Brittany Anderson - Spreadsheet of beneficiaries with eligibility, recruiters, and referral info dated July 14, 2010, September 15, 2011, and September 19, 2011		
APPLE STORAGE UNIT SEARCH			
106	Apple storage unit – Search photos		
107	Apple storage unit – Search inventory		

EXHIBIT	DESCRIPTION	OFFERED	ADMITTED
ULTIMATE CARE HOME HEALTH SERVICES, INC. (“ULTIMATE”) ADMINISTRATIVE SEIZURE			
108	Ultimate MFCU administrative seizure - File Request and Evidence Receipt		
OTHER			
109	Ultimate 485s signed by Teri Sivils under Dr. Roy’s signature		
ULTIMATE OFFICE SEARCH			
110	Ultimate office – Search photos		
111	Ultimate office – Search photo log		
112	Ultimate office – Search sketch		
113	Ultimate office – Search inventory		
114	Blank forms – Ultimate (Referral for Home Health Evaluation, Patient Information Sheet, Referral/Intake Form, Physician’s Verbal Order, Nursing Notes)		
115	Ultimate Board of Directors list		
116	Ultimate Medicare approval letter dated February 20, 2003		
117	Ultimate Board of Director and Professional Advisory Meeting minutes from February 2003-January 2009		
118	Ultimate Ethics Committee minutes from September 2004-January 2010		
119	Letter from Ultimate to Dr. Roy dated August 6, 2007		
MEDCARE HOUSECALLS, LLC (“MEDCARE”) OFFICE SEARCH			
120	Medcare office – Search photos		
121	Medcare office – Search photo log		
122	Medcare office – Search sketch		
123	Medcare office – Search inventory		
124	Letter of Resignation from Stella Green to Dr. Roy and Dr. Lamarre dated May 28, 2010		
125	Medicare Enrollment Application for Medcare dated August 25, 2011		

EXHIBIT	DESCRIPTION	OFFERED	ADMITTED
126	National Plan & Provider Enumeration System NPI Registry search for Medicare House Calls LLC on September 14, 2011		
127	Office of Inspector General U.S. Department of Health & Human Services Exclusions Database search for Medicare House Calls LLC on September 14, 2011		
128	Excluded Parties List System search for Medicare House Calls LLC on September 14, 2011		
129	Medicare nursing notes from Juan Galindo for Billie Stevenson dated November 30, 2011 and January 18, 2012		
130	Medicare Housecalls New Employee Form for Cybil Chatman		
131	Essencee Care Health Services Physician Order and 485 for Billie Stevenson dated January 6, 2012		
GLENN GANN SEARCH			
132	Glenn Gann – Search inventory		
NAMED BENEFICIARY FILES – PATIENT, PCP, DART, OTHER MISC.			
133	Daisy Turner – Medistat patient file		
134	Daisy Turner – Medistat electronic patient file		
135	Daisy Turner – Apple home health file		
136	Daisy Turner – Apple home health binder		
137	Daisy Turner – Parkland Health & Hospital System (“Parkland”) medical records		
138	Daisy Turner – Dallas Area Rapid Transit (“DART”) records		
139	Charles Beck – Medistat patient file		
140	Charles Beck – Medistat electronic patient file		
141	Charles Beck – Apple home health file		
142	Charles Beck – Parkland/Bluitt-Flowers Health Center (“Bluitt-Flowers”) medical records		
143	Cora Beck – Medistat patient file		
144	Cora Beck – Medistat electronic patient file		

EXHIBIT	DESCRIPTION	OFFERED	ADMITTED
145	Cora Beck – Apple home health file		
146	Cora Beck – Bluitt-Flowers medical records		
147	Loretta Shaw – Medistat patient file		
148	Loretta Shaw – Medistat electronic patient file		
149	Loretta Shaw – Ultimate home health file		
150	Loretta Shaw – Parkland medical records		
151	Loretta Shaw – DART records		
152	Barbara Lynch – Medistat patient file		
153	Barbara Lynch – Medistat electronic patient file		
154	Barbara Lynch – Ultimate home health file		
155	Barbara Lynch – DaVita Grapevine Dialysis medical records		
156	Vivian Owens – Medistat patient file		
157	Vivian Owens – Medistat electronic patient file		
158	Vivian Owens – Ultimate home health file		
159	Vivian Owens – Elite Orthopaedics of Las Colinas medical records		
160	Vivian Owens – Texas Workforce Commission records		
161	Paul White – Medistat patient file		
162	Paul White – Medistat electronic patient file		
163	Paul White – Charry home health file		
164	Paul White – Parkland medical records		
165	Paul White – Timberlawn Mental Health System medical records		
166	Paul White – The Bridge records		
167	Paul White – DART records		
168	Stanley Clovis – Medistat patient file		
169	Stanley Clovis – Medistat electronic patient file		
170	Stanley Clovis – Charry home health file		

EXHIBIT	DESCRIPTION	OFFERED	ADMITTED
171	Stanley Clovis – Parkland medical records		
172	Stanley Clovis – The Bridge records		
173	Stanley Clovis – Dallas County Jail records		
174	Rachael Sanchez – Medistat patient file		
175	Rachael Sanchez – Medistat electronic patient file		
176	Rachael Sanchez – Charry home health file		
177	Rachael Sanchez – Parkland medical records		
178	Rachael Sanchez – The Bridge records		
179	Rachael Sanchez – DART records		
180	Kenneth Farr – Medistat patient file		
181	Kenneth Farr – Medistat electronic patient file		
182	Kenneth Farr – Charry home health file		
183	Kenneth Farr – Parkland medical records		
184	Kenneth Farr – The Bridge records		
185	Ricky Galindo – Medistat patient file		
186	Ricky Galindo – Charry home health file		
187	Ivory Smith – Medistat patient file		
188	Ivory Smith – Charry home health file		
189	Billie Stevenson – Medistat patient file		
190	Billie Stevenson – Medistat electronic patient file		
191	Corine Williams – Medistat patient file		
192	Stacy Wooten – Medistat patient file		
193	Stacy Wooten – Charry home health file		
194	Stacy Wooten – Parkland medical records		
195	Kenneth Watson – Medistat patient file		
196	Kenneth Watson – Charry home health file		
197	Kenneth Watson – Parkland medical records		

EXHIBIT	DESCRIPTION	OFFERED	ADMITTED
198	Edna Rhodes – Medistat patient file		
199	Edna Rhodes – Medistat electronic patient file		
200	Don Maples – Medistat patient file		
SURVEILLANCE			
201	RESERVED		
202	Loretta Shaw – Photo Surveillance on August 20, 2012		
203	Loretta Shaw – Video Surveillance on December 18, 2012		Disc
204	Charles Beck – Video Surveillance on March 22, 2013		Disc
205	Paul White – Photographs taken during agent house visit on March 28, 2013		
206	Charles and Cora Beck – Video Surveillance on April 2, 2013		Disc
207	Loretta Shaw – Photographs of 2nd Floor apartment taken on September 10, 2015		
TEXAS SECRETARY OF STATE CORPORATE DOCUMENTS			
208	Medistat Group Associates – Articles of Association (July 16, 1990) and Assumed Name Certificates (October 1996 – October 2009)		
209	Apple of Your Eye Inc – Articles of Incorporation (February 22, 2005) and Certificate of Amendment (August 4, 2011)		
210	Medcare Housecalls LLC – Articles of Organization (March 30, 2005) and Articles of Amendment (June 3, 2008)		
211	Cyprian, Inc. – Articles of Incorporation (April 8, 2005)		
212	Charry Health Care Services, Inc. – Certificate of Formation (November 15, 2006)		
DR. ROY ASSETS			
213	Quebec Corp documents		
214	Cheshire, LTD documents		
215	Allianz Life Insurance Company of North America documents		

EXHIBIT	DESCRIPTION	OFFERED	ADMITTED
216	American Equity Investment Life Insurance Company documents		
217	S.E.I. Investments documents		
218	Life Insurance Company of the Southwest documents		
219	PacificLife Insurance Company documents		
220	Jackson National Life Insurance Company documents		
BACKGROUND ON MEDICARE			
221	Demonstrative ¹ – Medicare Parts A-D		
222	Demonstrative - Medicare Home Health – 5 Requirements		
223	Demonstrative - Medicare Definitions		
224	Demonstrative – Home Health Agencies in the Dallas Fort Worth Region 2004-2011		
225	Medicare Benefit Policy Manual – Chapter 7		
226	2005 CPT Code manual		
227	2006 CPT Code manual		
228	2007 CPT Code manual		
229	2008 CPT Code manual		
230	2009 CPT Code manual		
231	2010 CPT Code manual		
232	2011 CPT Code manual		
233	2005 HCPCS manual		
234	2006 HCPCS manual		
235	2007 HCPCS manual		
236	2008 HCPCS manual		
237	2009 HCPCS manual		
238	2010 HCPCS manual		

¹ Any exhibit marked as a Demonstrative may be offered by the Government as a summary chart if the elements of Rule 1006 are met.

EXHIBIT	DESCRIPTION	OFFERED	ADMITTED
239	2011 HCPCS manual		
240	Form CMS-485 (blank)		
241	Medicare card (blank)		
242	Demonstrative – Key Terms		
243	Curriculum Vitae for Mark Porter		
244	Blank OASIS form – Start of Care		
245	Blank OASIS form – Recertification		
246	Medicare and Medicaid Programs: Comprehensive Assessment and Use of the OASIS as Part of the Conditions of Participation for Home Health Agencies (42 CFR Part 484) dated January 25, 1999		
247	Medicare and Medicaid Programs: Reporting Outcome and Assessment Information Set Data as Part of the Conditions of Participation for Home Health Agencies (42 CFR Part 484) dated December 23, 2005		
ADDITIONAL MEDISTAT DOCUMENTS			
248	Demonstrative – Medistat organizational chart		
249	CPO example filled out by Dr. Roy		
250	RESERVED		
251	RESERVED		
252	Teri Sivils – Plea Agreement		
253	Teri Sivils – Plea Agreement Supplement		
254	Teri Sivils – Factual Resume		
255	Teri Sivils – Proffer Letter		
256	Provider Texas Home Health – Articles of Incorporation (August 6, 2004), Assumed Name Certificates (November 2004-July 2005), Certificate of Amendment (June 8, 2011)		
257	Provider Texas Home Health Medicare application		

EXHIBIT	DESCRIPTION	OFFERED	ADMITTED
258	Certificate of Attendance for James Aston at HCSSA Pre-Survey Conference dated November 8, 2004		
259	Texas Department of Aging & Disability Services (DADS) license letter for Provider Texas Home Health effective June 10, 2005		
260	2006 Provider Texas Home Health checkbook		
261	BackPro business card for James Aston		
262	Poster created by James Aston on January 27, 2006		
263	James Aston audio – 1D 001 James Aston/Jacques Roy		Disc
264	James Aston transcript – 1D 001 James Aston/Jacques Roy		
265	James Aston audio – 1D 002 James Aston/Jacques Roy		Disc
266	James Aston transcript – 1D 002 James Aston/Jacques Roy		
267	James Aston audio – 1D 003 James Aston/Jacques Roy		Disc
268	James Aston transcript – 1D 003 James Aston/Jacques Roy		
269	James Aston – Proffer Letter		
270	Medcare blank in home visit form		
271	Email correspondence between Augie Galindo and Christie Staves dated December 2011-February 2012		
272	Photo of Medcare sign		
ADDITIONAL ULTIMATE DOCUMENTS			
273	Cyprian Akamnonu – Plea Agreement		
274	Cyprian Akamnonu – Plea Agreement Supplement		
275	Cyprian Akamnonu – Factual Resume		
276	Cyprian Akamnonu – Proffer Letter		
277	Patricia Akamnonu – Plea Agreement		

EXHIBIT	DESCRIPTION	OFFERED	ADMITTED
278	Patricia Akamnonu – Plea Agreement Supplement		
279	Patricia Akamnonu – Factual Resume		
THE BRIDGE			
280	Pictures of The Bridge		
281	Photo log of The Bridge		
282	The Bridge Homeless Recovery Center information pamphlets		
283	Charity Eleda business card given to Dallas Police Officer BC Wetton		
284	Charity Eleda file folder from Dallas Police Detective Julie Cassidy		
285	Driver's License photos of recruits – Ricky Galindo and Rachael Sanchez		
NICHOLAS LAMARRE			
286	Nicholas Lamarre – Target letter dated March 8, 2012		
287	Nicholas Lamarre – Proffer letter dated April 10, 2012		
288	Nicholas Lamarre – Video statement dated July 27, 2012		Disc
ERNEST AMADI			
289	Fox 4 News report/video regarding Alliance Home Health scheme dated November 15, 2010		Disc
290	Transcript of Fox 4 News report/video regarding Alliance Home Health scheme dated November 15, 2010		
291	Unaired portion of Fox 4 News report/video regarding Alliance Home Health scheme dated November 15, 2010		Disc
292	Unaired portion transcript of Fox 4 News report/video regarding Alliance Home Health scheme dated November 15, 2010		
293	Ernest Amadi – Plea Agreement		
294	Ernest Amadi – Plea Agreement Supplement		
295	Ernest Amadi – Factual Resume		

EXHIBIT	DESCRIPTION	OFFERED	ADMITTED
296	Ernest Amadi – Proffer Letter		
MEDICARE SUSPENSION DOCUMENTS			
297	Medicare suspension notice for Medistat dated June 23, 2011		
298	Medicare suspension notice for Jacques Roy dated June 23, 2011		
299	Medicare suspension notice for Louise Lamarre dated June 23, 2011		
300	Medicare suspension termination for Louise Lamarre dated November 12, 2013		
301	Medicare suspension notice for Charry dated June 23, 2011		
302	Medicare suspension notice for Apple dated September 22, 2011		
303	Medicare suspension notice for Ultimate dated September 2, 2010		
304	Medicare suspension notice for Cyprian, Inc. dated March 5, 2012		
305	Medicare suspension notice for Medcare dated April 3, 2012		
306	Medicare suspension notice for PTM Healthcare dated March 5, 2012		
307	RESERVED		
308	RESERVED		
FERGUSON IKHILE			
309	Ferguson Ikhile – Plea Agreement		
310	Ferguson Ikhile – Plea Agreement Supplement		
311	Ferguson Ikhile – Factual Resume		
MEDISTAT SUBPOENAED DOCUMENTS			
312	Texas Medical Board documents regarding Dr. Roy		
ADDITIONAL MEDICARE DOCUMENTS			
313	Medicare Claims Processing Manual – Chapter 1		Disc
314	Medicare Claims Processing Manual – Chapter 10		Disc

EXHIBIT	DESCRIPTION	OFFERED	ADMITTED
315	Medicare Claims Processing Manual – Chapter 12		Disc
316	Medicare enrollment application for Medistat		
317	Medicare EFT agreement for Medistat		
318	Medicare EDI agreement for Medistat		
319	ZPIC FID Info for Medistat		
320	Medicare enrollment documentation for Jacques Roy		
321	ZPIC FID Info for Jacques Roy		
322	Medicare enrollment documentation for Louise Lamarre		
323	ZPIC FID Info for Louise Lamarre		
324	Medicare suspension declaration for Medistat, Jacques Roy, and Louise Lamarre, and Medistat dated June 7, 2011		
325	Medicare enrollment application for Apple		
326	Medicare EFT agreement for Apple		
327	Medicare EDI agreement for Apple		
328	ZPIC FID Info for Apple		
329	Medicare suspension declaration for Apple dated June 7, 2011		
330	Medicare enrollment application for Charry		
331	Medicare EFT agreement for Charry		
332	Medicare EDI agreement for Charry		
333	ZPIC FID Info for Charry		
334	Medicare suspension declaration for Charry dated June 7, 2011		
335	Medicare enrollment application for Ultimate		
336	Medicare EFT agreement for Ultimate		
337	Medicare EDI agreement for Ultimate		
338	ZPIC FID Info for Ultimate		

EXHIBIT	DESCRIPTION	OFFERED	ADMITTED
339	Medicare suspension declaration for Ultimate dated February 22, 2012		
340	Medicare enrollment application for Medicare		
341	Medicare EFT agreement for Medicare		
342	Medicare EDI agreement for Medicare		
343	ZPIC FID Info for Medicare		
344	Medicare suspension declaration for PTM Healthcare dated February 22, 2012		
MEDICARE CLAIMS DATA			
345	Medicare claims data for Medistat		Disc
346	Medicare claims data for Apple		Disc
347	Medicare claims data for Charry		Disc
348	Medicare claims data for Ultimate		Disc
349	Medicare claims data for Medicare		Disc
350	Medicare claims data for PTM Healthcare		Disc
351	Medicare claims data for DePromise Home Health Services		Disc
352	Medicare home health header claims data for Jacques Roy		Disc
353	Medicare home health header claims data for Louise Lamarre		Disc
354	Medicare home health header claims data for Murray Strauss		Disc
355	Medicare home health header claims data for Don Christiansen		Disc
356	Medicare home health header claims data for Warner Massey		Disc
MEDICARE BILLING DATA SUMMARIES			
357	Daisy Turner – Billing Data summary		
358	Charles Beck – Billing Data summary		
359	Cora Beck – Billing Data summary		
360	Loretta Shaw – Billing Data summary		
361	Barbara Lynch – Billing Data summary		

EXHIBIT	DESCRIPTION	OFFERED	ADMITTED
362	Vivian Owens – Billing Data summary		
363	Paul White – Billing Data summary		
364	Stanley Clovis – Billing Data summary		
365	Rachael Sanchez – Billing Data summary		
366	Kenneth Farr – Billing Data summary		
367	Ricky Galindo – Billing Data summary		
368	Ivory Smith – Billing Data summary		
369	Billie Stevenson – Billing Data summary		
370	Corine Williams – Billing Data summary		
MEDICARE REMITTANCE ADVICES			
371	Daisy Turner – Part A Medicare Remittance Advice		
372	Daisy Turner – Part B Medicare Remittance Advice		
373	Charles Beck – Part A Medicare Remittance Advice		
374	Charles Beck – Part B Medicare Remittance Advice		
375	Cora Beck – Part A Medicare Remittance Advice		
376	Cora Beck – Part B Medicare Remittance Advice		
377	Loretta Shaw – Part A Medicare Remittance Advice – none found		
378	Loretta Shaw – Part B Medicare Remittance Advice		
379	Barbara Lynch – Part A Medicare Remittance Advice		
380	Barbara Lynch – Part B Medicare Remittance Advice		
381	Vivian Owens – Part A Medicare Remittance Advice		
382	Vivian Owens – Part B Medicare Remittance Advice		
383	Paul White – Part A Medicare Remittance Advice		

EXHIBIT	DESCRIPTION	OFFERED	ADMITTED
384	Paul White – Part B Medicare Remittance Advice		
385	Stanley Clovis – Part A Medicare Remittance Advice		
386	Stanley Clovis – Part B Medicare Remittance Advice		
387	Rachael Sanchez – Part A Medicare Remittance Advice		
388	Rachael Sanchez – Part B Medicare Remittance Advice		
389	Kenneth Farr – Part A Medicare Remittance Advice		
390	Kenneth Farr – Part B Medicare Remittance Advice		
391	Ricky Galindo – Part A Medicare Remittance Advice		
392	Ivory Smith – Part A Medicare Remittance Advice		
393	Billie Stevenson – Part B Medicare Remittance Advice		
394	Corine Williams – Part B Medicare Remittance Advice		
MISCELLANEOUS			
395	Recredentialing paperwork for Augie Galindo signed June 10, 2011		
396	Recredentialing paperwork for Mary (Patricia) Headley signed June 9, 2011		
397	Recredentialing documents for Don Christiansen signed June 20, 2011		
398	Travel records for Jacques Roy		
399	Medicare & You 2016 – Official U.S. Government Medicare handbook		
400	Demonstrative – State and National Rankings of Certifying Physicians		
401	Demonstrative – Descriptions of office locations for Medistat office sketch		
402	Demonstrative – Legitimate Process for Medicare Home Health		
403	DePromise search warrant – Folders found labeled Dr. Roy		

EXHIBIT	DESCRIPTION	OFFERED	ADMITTED
404	DePromise search warrant – DePromise patient file for Robert Washington		Disc
FINANCIAL RECORDS			
405	Medistat Group Associates Bank of America account x8914		Disc
406	Medistat Group Associates Bank of America account x5757		Disc
407	Medistat Group Associates, Inc dba Backpro Bank of America account x9989		Disc
408	Medistat Group Associates Capital One, N.A. account x9921		Disc
409	Royleam Inc JP Morgan Chase account x3452		Disc
410	Louise Lamarre and Jacques A Roy Bank of America account x1176		Disc
411	Medcare Housecalls LLC Washington Mutual/JP Morgan Chase account x 8412		Disc
412	Medcare Housecalls LLC JP Morgan Chase account x8519		Disc
413	Apple of Your Eye Inc dba Apple of Your Eye Healthcare Services Inc JP Morgan Chase account x2253		Disc
414	Apple of Your Eye, Inc Bank of America account x6719		Disc
415	Apple of Your Eye, Inc/Wilbert J Veasey Jr Bank of America account x0356		Disc
416	Apple of Your Eye, Inc/Wilbert J Veasey Jr Bank of America account x6214		Disc
417	Apple of Your Eye, Inc Medicaid Acct Bank of America account x6939		Disc
418	Apple of Your Eye Inc Medicaid Account II Bank of America account x5867		Disc
419	Apple of Your Eye Inc Medicaid 4 Bank of America account x8262		Disc
420	Apple of Your Eye Inc Medicare Payroll Bank of America account x5281		Disc
421	Apple of Your Eye Inc Medicare Payroll Bank of America account x1005		Disc

EXHIBIT	DESCRIPTION	OFFERED	ADMITTED
422	Apple of Your Eye Inc Medicare Payroll Bank of America account x8671		Disc
423	Apple of Your Eye Inc Depository Account Bank of America account x2340		Disc
424	Apple of Your Eye Inc JP Morgan Chase account x6765		Disc
425	Apple of Your Eye Inc JP Morgan Chase account x6766		Disc
426	Apple of Your Eye Inc Bank of America account x1290		Disc
427	Apple of Your Eye Inc JP Morgan Chase account x2261		Disc
428	Apple of Your Eye Inc Bank of America account x4494		Disc
429	Apple of Your Eye Inc Bank of America account x5322		Disc
430	Apple of Your Eye Inc Bank of America account x5335		Disc
431	Apple of Your Eye Inc Bank of America account x8615		Disc
432	Apple of Your Eye Inc JP Morgan Chase account x9136		Disc
433	Cynthia D Stiger Bank of America account x3721		Disc
434	Cynthia D Stiger Bank of America account x8588		Disc
435	Cynthia D Stiger Bank of America account x1669		Disc
436	Wilbert J Veasey Jr Bank of America account x9673		Disc
437	Wilbert J Veasey Jr Bank of America account x9078		Disc
438	Wilbert J Veasey Jr JP Morgan Chase account x1665		Disc
439	Charry Health Care Services Inc BBVA Compass Bank account x8253		Disc
440	Cyprian Inc dba Ultimate Care Home Health Services Bank of America account x9747		Disc

EXHIBIT	DESCRIPTION	OFFERED	ADMITTED
441	Cyprian Inc dba Ultimate Care Home Health Services Bank of America account x0011		Disc
442	Cyprian Inc dba Ultimate Care Home Health Services CBA/PHC Program Bank of America account x0024		Disc
443	Cyprian Inc dba Ultimate Care Home Health Services CBA/PHC Program Bank of America account x2835		Disc
444	Cyprian Inc dba Ultimate Care Home Health Services CBA/PHC Program Bank of America account x3153		Disc
445	JIPACT LLC BBVA Compass Bank account x8110		Disc
446	Tender Touch Home Health Agency Inc BBVA Compass Bank account x9903		Disc
447	Bank record excerpts – Indictment counts		
448	Bank record excerpts – Checks from Ultimate to Dr. Roy		
SUMMARY CHARTS			
449	Keeping Apple Afloat		
450	Significant Payees from Apple of Your Eye Bank Accounts		
451	Apple of Your Eye Cash Withdrawals By Year		
452	Cynthia Stiger Profits		
453	Wilbert Veasey Profits		
454	Donations to Churches Out of Apple and Wilbert Veasey Accounts		
455	Apple of Your Eye Signature Analysis		
456	Examples of Personal Expenses Paid Out of Charry Accounts		
457	Jacques Roy Profits		
458	Medistat Deposit Analysis (January 2006 through August 2011)		
459	Charry Home Care Services, Inc. Deposits Analysis (May 2007 through March 2011)		

EXHIBIT	DESCRIPTION	OFFERED	ADMITTED
460	Medicare Housecalls Deposit Analysis (June 2011 through September 2012)		
461	Apple of Your Eye Deposits Analysis (January 2006 through August 2011)		
462	Charry Home Care Services Medicare Claims Medistat vs Non Medistat Physicians (June 2010 – June 2011)		
463	Apple of Your Eye, Inc. Medicare Claims Submission Medistat vs Non Medistat (April 2006 through July 2011)		
464	Ultimate Medicare Claims Submission Medistat Physicians vs Non Medistat (January 2006 – December 2010)		
465	Medicare: Medicare Claims Billing Analysis By Year		
466	Medicare Claims Analysis Comparison Between May and June 2011		
467	Percent to Total Analysis of Charry Data		
468	Apple of Your Eye, Inc. Longest Consecutive Medistat Beneficiaries on Home Health		
469	Dr. Roy Patient Per Day Analysis Medistat Part B Billing January 2006 through August 2011		
470	Dr. Roy # of G Codes Billed on Christmas Day		
471	Dr. Roy Medicare Claims Submission During Certain Dates He Was Out of the Country		
472	# of Days Per Month a G Code Bill was Generated to Medicare Under Dr. Roy		
473	Dr. Roy Top 25 Days for G Code Billing		
474	Medistat Claims Analysis on Select Procedure Codes Average Allowed by Year		
475	Apple Cash Calendar		
476	Medistat 485 Review		
MEDICAID			
477	2004 Medicaid manual		Disc
478	2005 Medicaid manual		Disc
479	2006 Medicaid manual		Disc

EXHIBIT	DESCRIPTION	OFFERED	ADMITTED
480	2007 Medicaid manual		Disc
481	2008 Medicaid manual		Disc
482	2009 Medicaid manual		Disc
483	2010 Medicaid manual		Disc
484	2011 Medicaid manual		Disc
485	2012 Medicaid manual		Disc
486	Medicaid claims data for Medistat		Disc
487	Medicaid claims data for Apple		Disc
488	Medicaid claims data for Ultimate		Disc
489	Medicaid claims data for Medcare		Disc
PHONE DOWNLOAD REPORTS			
490	Jacques Roy phone download report		Disc
491	Cynthia Stiger phone download report		Disc
485s			
492	Medistat 485s		Disc
PHOTOGRAPHS			
493	Driver's License photos of witnesses		
BUSINESS RECORD CERTIFICATIONS			
494	Lufthansa German Airlines certification for Exhibit 83		
495	U.S. Customs and Border Protection certification for Exhibit 84		
496	Parkland certifications for Exhibits 137, 142, 146, 150, 164, 171, 177, 183, 194, 197		
497	DART certifications for Exhibits 138, 151, 167, 179		
498	DaVita certification for Exhibit 155		
499	Elite Orthopedics/Michael Muncy, DO certification for Exhibit 159		
500	Texas Workforce Commission certification for Exhibit 160		
501	Timberlawn certification for Exhibit 165		

EXHIBIT	DESCRIPTION	OFFERED	ADMITTED
502	Dallas Sheriff's Department certification for Exhibit 173		
503	Management Services International/Quebec Corporate, Ltd/Cheshire, Ltd certification for Exhibits 213-214		
504	Allianz Life Insurance Company certification for Exhibit 215		
505	American Equity Investment Life Insurance Company certification for Exhibit 216		
506	SEI Private Trust Company certification for Exhibit 217		
507	National Life Insurance Company/Life Insurance Company of the Southwest certification for Exhibit 218		
508	PacificLife Insurance Company certification for Exhibit 219		
509	Jackson National Life Insurance Company certification for Exhibit 220		
510	Elite Video Productions certification for Exhibit 288		
511	KDFW Fox 4 certification for Exhibits 289 and 291		
512	Texas Medical Board certification for Exhibit 312		
513	Bank of America certifications for Exhibits 405-407, 410, 414-423, 426, 428-431, 433-437, 440-444		
514	Capital One certifications for Exhibit 408		
515	JPMorgan Chase Bank certifications for Exhibits 409, 411-413, 424-425, 427, 432, 438		
516	BBVA Compass certifications for Exhibits 439, 445-446		
517	Electronically seized evidence report for Exhibits 35-41, 102, 119, 134, 140, 144, 148, 153, 157, 162, 169, 175, 181, 190, 199 (Jesse Hartman)		
518	Electronically seized evidence report for Exhibits 20-34, 90, 104-105, 109, 492 (Brian Huber)		

EXHIBIT	DESCRIPTION	OFFERED	ADMITTED
519	Medicare/ZPIC certification for Exhibits _____		
520	Medicare/CMS certification for Exhibits _____		

[Nothing further on this page.]

Respectfully submitted,

JOHN R. PARKER
UNITED STATES ATTORNEY

/s/ P.J. Meitl
P.J. MEITL
Assistant United States Attorney
D.C. Bar No. 502391
Virginia Bar No. 73215
1100 Commerce Street, Third Floor
Dallas, Texas 75242-1699
Telephone: 214.659.8680
Facsimile: 214.659.8809
Email: philip.meitl@usdoj.gov

/s/ Nicole Dana
NICOLE DANA
Special Assistant United States Attorney
Texas State Bar No. 24062268
1100 Commerce Street, Third Floor
Dallas, Texas 75242-1699
Telephone: 214.659.8694
Facsimile: 214.659.8805
Email: nicole.dana@usdoj.gov

/s/ Chad E. Meacham
CHAD E. MEACHAM
Criminal Chief
Texas State Bar No. 00784584
1100 Commerce Street, Third Floor
Dallas, Texas 75242-1699
Telephone: 214.659.8716
Facsimile: 214.767.4100
Email: chad.meacham@usdoj.gov

CERTIFICATE OF SERVICE

On February 15, 2016, I electronically submitted the following document with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all counsel and/or pro se parties of record electronically or by another manner authorized by Federal Rule of Criminal Procedure 49(b).

/s/ Nicole Dana

Nicole Dana

Special Assistant United States Attorney